

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

YURY REMEDIO

CIVIL ACTION

versus

NO.: 6:21-cv-03527

**NOBLE DRILLING (U.S.), LLC
ET AL**

**JUDGE
ROBERT R SUMMERHAYS**

**MAGISTRATE JUDGE
CAROL B. WHITEHURST**

**MOTION FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADINGS**

NOW INTO COURT, through undersigned counsel, come Defendants, Noble Drilling (US) LLC, Noble Drilling Services, LLC f/k/a Noble Drilling Services, Inc., and Noble Holding LLC (hereinafter also referred to as “Defendants”), with full reservation of all defenses and for the limited purpose of requesting an additional seventeen (17) days, through and including November 1, 2021, within which to answer or otherwise respond. In support of this motion, undersigned counsel states that a responsive pleading for Defendant would otherwise be due on or about October 14, 2021, that additional time would assist in formulating an appropriate response to the Petition for Damages; that this is the first such request for extension; and that this request will not unduly delay these proceedings. Moreover, counsel for Yury Remedio, Larry Curtis, has been contacted and has no objection to this request and Motion.

WHEREFORE, Defendant prays that this Court grant the request for an additional seventeen (17) days and sign the attached Order granting same.

Respectfully submitted:

By: /s/ Robert Kallam

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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of October, I electronically filed the foregoing with the Clerk of Court by using the CM/EMF system which I will send a notice of electronic filing to all counsel of record. I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to those who are non-CM/EMF participants.

Lafayette, Louisiana, this 14th day of October, 2021.

/s/Robert Kallam

Robert M. Kallam